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Report Series 1992

92-7 AMO's Response to the Ontario Scrap Tire Task Force's Scrap Tire Action Plan

Association of Municipalities of Ontario
April 1992

MISSION STATEMENT

AMO unites Ontario's municipalities.

We take pride in promoting, supporting and enhancing strong and effective municipal government.

We provide strategic leadership by:

- developing and effectively promoting responsive quality policy;
- informing and educating governments, the media and the public;
- marketing innovative and beneficial services.

Our elected representatives, municipal officials and association staff form a team which values and respects:

- diversity and local autonomy;
- fairness and equity;
- consultation;
- consensus;
- co-operation.

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EXECUTIVE SUMMARY

The management of scrap tire waste in Ontario has been an issue of concern to provincial and municipal governments since the mid-1980s. During the late 1980s, the Minister of the Environment appointed representatives from a variety of sectors to form the Ontario Scrap Tire Task Force (OSTTF) and advise the Minister on an action plan for managing scrap tires in Ontario.

The establishment of that task force occurred just before the major tire fire in Hagersville, Ontario in February 1990. That fire, with its resulting environmental and financial consequences, focused attention in Ontario on the need for a scrap tire management strategy for the province. Work continued on developing that strategy, but in the meantime, municipalities have been working to address the problem on the front lines. AMO also issued AMO's Policy Position on: Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991) to provide municipal input to the various scrap tire management options which the Minister of the Environment and the OSTTF were beginning to consider.

Now, the OSTTF has finally released its Action Plan for the Management of Scrap Tires in Ontario. This has been forwarded to the Minister of the Environment and AMO is commenting on the Action Plan because of its long-term consequences for municipalities and their management of scrap tires.

In this response to the OSTTF's Action Plan for the Management of Scrap Tires in Ontario, AMO makes five recommendations. It says the Ontario government should:

- make elimination of all scrap tire waste in Ontario the goal of its scrap tire management program. Reducing tire waste to "an acceptable level" should only be an interim goal used on the way to meeting the province's ultimate goal.

- a) immediately implement a strategy for managing scrap tires which does not include stockpiling this waste;

b) test tire-derived fuel now, rather than after the testing of rubberized asphalt; and

c) introduce tire-derived fuel, at a minimum, as an interim measure until all scrap tires in Ontario can be recycled.

- be responsible for operating any licensed scrap tire receiving facilities required by its provincial policy. Municipalities should not be required to institute these as this would run counter to the provincial-municipal disentanglement process now occurring.

- dedicate all of the revenue from the Ontario Tire Tax to solving the scrap tire waste management problem. This is important so the province does not just take the money and leave municipalities with the problem.

- in the interim, be responsible for all of the costs and consequences of these interim measures of stockpiling tires.

At the end of this paper, AMO concludes that it appreciates the work which the Ontario Scrap Tire Task Force has done on its Action Plan for the Management of Scrap Tires in Ontario. But AMO continues to be concerned about the financing, stockpiling and low priority put on tire-derived fuel when so many of the short-term options for dealing with scrap tire waste management are so tentative or far from being developed. Municipalities are on the front line of dealing with this problem and they need support for this area to begin now and not in four years and it urges the provincial government to institute AMO's recommendations.

1 Introduction

The management of scrap tire waste in Ontario has been an issue of concern to provincial and municipal governments since the mid-1980s. In 1989, the Minister of the Environment appointed representatives from a variety of sectors to form the Ontario Scrap Tire Task Force (OSTTF). The purpose of the task force was to advise the Minister on an action plan for the management of scrap tires in Ontario. In February 1990, the issue of how scrap tires are managed became even more pressing when a major tire fire occurred near Hagersville in southern Ontario.

The Association of Municipalities of Ontario (AMO) has been involved in this issue for several years. When the OSTTF was formed, AMO named a representative to the task force and in 1991, it expanded its presence on the task force to two municipal representatives. Late last year, AMO also issued AMO's Policy Position on: Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), which addressed the various options which the Minister of the Environment and the OSTTF were beginning to consider for the management of scrap tires in Ontario.

Municipal concerns in this area have been many. For one thing, the Ontario government has been collecting the Ontario tire tax since June 1989, but this money has been going to the province's general revenues and has not been totally dedicated to solving the scrap tire waste management problems. The province has strengthened its guidelines for stockpiling tires, but municipalities have generally been left on their own to address the problem. On the one hand, they are concerned with the fact that non-shredded tires take up much space in their landfills. This is a problem since landfill space is being quickly used up throughout Ontario, and long, expensive and complicated planning and environmental assessment processes plus the ever-growing "not in my back yard" (NIMBY) syndrome has caused many difficulties in siting new landfills. On the other hand, municipalities are also concerned about stockpiling tires, particularly since the 1990 fire in Hagersville. This option is expensive and only an interim method. It also increases the opportunities for arson, which can cause great financial and environmental problems for both the municipal and provincial governments.

It is because of this interest and AMO's involvement that AMO has been closely watching the development of the Ontario Scrap Tire Task Force's Action Plan for the Management of Scrap Tires in Ontario. That plan has just been completed and forwarded to the Minister of the Environment.

In this document, AMO has responded to the general concepts expressed in the OSTTF's Action Plan for the Management of Scrap Tires in Ontario. AMO's response is based on the policies which it set out in AMO's Policy Position on: Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991). Many of those policies have been re-iterated in the new context of this response.

AMO is forwarding its comments to both the OSTTF and the Minister of the Environment, who is considering the OSTTF's Action Plan for a provincial strategy for managing scrap tires in Ontario. Since the Action Plan advocates some methods of management which AMO disagrees with, particularly stockpiling, and puts a low priority on one management method with AMO advocates, incineration, AMO urges the province to incorporate AMO's comments into the plan which it is developing since municipalities are still the main managers of municipal solid waste throughout Ontario.

2 Goal

- The Ontario Scrap Tire Task Force's (OSTTF) Action Plan says its goal is to eliminate or reduce, to an acceptable level, the number of scrap tires existing in, and entering, the waste stream.

  AMO's recommendation is that the ultimate goal of any provincial scrap tire management plan should be to eliminate all scrap tire waste in the province. An acceptable interim target could be to reduce tire waste to "an acceptable level", but this should only be viewed as one step toward the ultimate goal.

RECOMMENDATION #1:

The provincial government should make elimination of all scrap tire waste in Ontario the goal of its scrap tire management program. Reducing tire to "an acceptable level" should only be an interim goal used on the way to meeting the province's ultimate goal.

3 Implementation

- The OSTTF's Action Plan does not discuss an implementation framework for its strategy. The only reference to the timing of this strategy is in the section on "Trigger Point", which says it could be 1995 before markets for value-added products make a significant impact on the diversion of scrap tires from disposal. Even then, it says it is possible value-added products may not meet the projected diversion quantities by the end of 1996. The rest of the "Trigger Point" discussion notes the limits the tire stockpiles can reach before tire-derived fuel may be used. However, this option may be rejected if it is decided that there is sufficient progress toward the province's goals, then the stockpiles will be allowed to accumulate.

- AMO said in AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), that:

  - Recommendation #3d): the Ontario government should not pursue the philosophy, even in the short-term, of stockpiling scrap tires, and

  - Recommendation #3f): the Ontario government should use all haste in pursuing the options which AMO supports as a long-term solution to scrap tire management in Ontario.

- Given that municipalities are struggling now to cope with scrap tire management and given that the OSTTF implies it could be three to four years before the province even assesses whether its

stockpiling and value-added product strategy is working, AMO urges the provincial government to immediately implement a strategy for managing scrap tires which does not include stockpiling so this waste.

- AMO has already said, in Recommendation #3 of AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), that the Ontario government should:

  a) approve the use of tire-derived fuel;

  b) use rubberized asphalt if it is subjected to, and meets, environmental and performance standards;

  c) use other processes by which value-added products are created from scrap tires; and

  d) not pursue the philosophy, even in the short-term of stockpiling scrap tires.

- AMO has also said in the tire-derived fuel text of AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), that the Minister of the Environment should test tire-derived fuel now, rather than after the testing of rubberized asphalt. She should then introduce tire-derived fuel, at a minimum, as an interim measure until all scrap tires in Ontario can be recycled.

RECOMMENDATION #2:

The Ontario government should:

a) **immediately implement a strategy for managing scrap tires which does not include stockpiling so this waste;**

b) **test tire-derived fuel now, rather than after the testing of rubberized asphalt; and**

c) **introduce tire-derived fuel, at a minimum, as an interim measure until all scrap tires in Ontario can be recycled.**

4 Who Pays

4.1 OSTTF's Plan

Financial references concerning scrap tire waste management are scattered throughout the OSTTF's Action Plan. The Plan notes:

- demonstration projects for rubber modified asphalt can be initiated by the provincial government, municipalities, or the private sector, and these projects can be financially assisted by the MOE (Ministry of the Environment) through existing funding programs (page 7);

- a separate funding mechanism for using crumb rubber in asphalt must be developed if net costs are higher (page 8);

- existing MOE programs can be used to provide financial assistance to processors for installing the required equipment to provide sufficient crumbing capacity in Ontario (page 8);

- a cash incentive system is needed to ensure that tires move through the collection system. This may include the province paying incentives on a passenger tire equivalent basis to licensed

receiving facilities, processors and tire derived product producers (page 10). It may also include subsidies to product processors (page 11);

- up to fifteen licensed scrap tire receiving facilities will be required across the province. For these, the OSTTF suggests the MOE establish a "benefit package for the operators and promote the funding mechanism for these sites" (page 16).
  - The OSTTF says this funding mechanism should include:
  - 100% capital funding for municipal sites and a negotiable amount for private sites;
  - operating subsidies based on a per tire figure;
  - funding for fall-back disposal if end markets do not materialize.
- The OSTTF also says the MOE should establish provincial sites "where municipal or private sites are not workable i.e. remote areas." (page 17)

4.2 AMO's Response

AMO has several concerns about these points, some of which are addressed by the Finance section of the OSTTF's Action Plan and some of which are not.

4.2.1 Measures Counter Disentanglement

- One of AMO's primary concerns is with the OSTTF's concept of municipal involvement in the licensed scrap tire receiving facilities its plan would require across the province. The OSTTF's concept is that these would be operated by municipalities or the private sector and municipal sites would receive 100% capital funding. The provincial government would only establish provincial sites "where municipal or private sites are not workable i.e. remote areas".

AMO strongly opposes this proposal, which would make municipalities responsible for the provincial initiative of stockpiling. The Minister of the Environment and her staff know municipalities have opposed this initiative. Also, to proceed with it contradicts the process of disentanglement, in which the provincial and municipal governments now are engaged.

While AMO appreciates the fact that municipal sites would be offered 100% capital funding, while the private sector may not receive as much, municipalities would still be responsible for any non-capital costs which have been incurred in carrying out this strategy which they oppose.

RECOMMENDATION #3:

The Ontario government should be responsible for operating any licensed scrap tire receiving facilities required by its provincial policy. Municipalities should not be required to institute these as this would run counter to the provincial-municipal disentanglement process now occurring.

4.2.2 Financing the System

- AMO believes, as noted in AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), that the scrap tire management system which is implemented should be user-pay. AMO thus still urges the Ontario government to ensure the systems which are implemented are user-pay.

- AMO is concerned about the potential costs of the various initiatives outlined in the OSTTF's Action Plan. Because of that, AMO:

  - believes that if the collection system which the OSTTF is proposing is instituted, it should be self-sustaining;

- agrees with the OSTTF's statement that all revenue derived from the tire tax, which was instituted in June 1989, should be used to support the scrap tire management action plan;

- agrees with the OSTTF statement that the province should adopt the concept that, to the extent necessary, the tire tax will be used for the direct on-going subsidy of tire-derived value added products in a way that will not detrimentally effect free trade dynamic.

  However, AMO wishes to note that the revenue from the tire tax should not go solely to this but to all of the financial measures which the OSTTF has proposed in its Action Plan or all of the measures which the Minister of the Environment chooses to implement.

4.2.3 Consumers Pay Once

- In its Action Plan, the OSTTF notes several times that consumers should only have to pay one tire tax and not the tax plus other disposal fees.

- AMO identified this concern in AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991). Because the $5.00 Ontario Tire Tax, which was introduced in 1989, was going to the province's general revenues and not to solving the scrap tire waste management problem, many municipalities were beginning to find it necessary to charge consumers a second "tax" for disposing of scrap tires.

- AMO agrees that consumers should only have to pay one tax or fee for tires. However, this can only be done if all of the revenue from the Ontario Tire Tax is dedicated to solving the scrap tire waste management problem so the province is not just taking the money and leaving municipalities with the disposal problem.

RECOMMENDATION #4:

The Ontario government should dedicate all of the revenue from the Ontario Tire Tax to solving the scrap tire waste management problem. This is important so the province does not just take the money and leave municipalities with the problem.

5 4Rs Hierarchy

5.1 General Comment

- AMO approves of the Action Plan document's format of placing the province's waste strategy in a framework of reduce, reuse, and recycle. However, the fourth "R" of recovery should also be included in the document format as the OSTTF's Action Plan recognizes that the recovery option of tire-derived fuel may still be necessary.

5.2 Initiatives: Reduction

- AMO appreciates the thrust of the Ontario Scrap Tire Task Force's (OSTTF) philosophy of reducing the generation of scrap tires by reducing society's dependence on the car and increasing the life of tires used by Ontario drivers. While AMO appreciates that provincial transportation policies are gradually beginning to reflect the importance of decreasing car use, car use is still key in this society and the OSTTF's action plan shows no reason to believe that this will change in the immediate future.

- AMO also notes the OSTTF's comment that tire life has significantly increased in recent years, but "further improvements are not expected to be of the same magnitude".

- The actions noted under this Initiative are good advice, but may have limited short-term effect on the scrap tire waste management problem municipalities are currently facing.

5.3 Initiatives: Reuse

- The retreading options are worth exploring, particularly for the long term, but AMO notes that they will have limited short-term effect on municipalities' current problems with managing scrap tire waste.

- Under "Procurement Policy Changes", AMO notes in point one that the province should "request" municipalities to give preference to retreaded bus tires rather than requiring them. The "request" option is noted in point two and this change would provide consistency.

5.4 Initiatives: Recycling - Value-Added Products

- In AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), AMO supports the provincial government's use of other processes by which value-added products are created from scrap tires.

- The OSTTF's Action Plan provides much detail on this concept. It discusses: the use of procurement policies to encourage use of these products, methods to develop an infrastructure for processing crumb tire from Ontario scrap tires, and the use of value-added products containing scrap tire can be enhanced.

- AMO agrees with the OSTTF's objective in pursuing the concept of value added products. That objective is to accelerate the development of products and the expansion of markets which make use of crumb rubber in value added products.
  However, as noted above, there are financial implications to many of the measures. The points raised in the earlier section should be addressed before the MOE proceeds further with this initiative.

- The OSTTF Action Plan notes under procurement policies in this section, that "Actions would be required within purchasing departments of all levels of government". AMO cautions the OSTTF, and the provincial government, about making procurement policies mandatory for other levels of government. These would again have financial implications and, as the Ministry of the Environment is aware, the province and municipalities are involved in a disentanglement process which discourages one level of government from legislating another level of government to take actions for which the first level of government is not also providing the necessary funding.

5.5 Initiatives: Recycling - Rubber Modified Asphalt

- The OSTTF's Action Plan still considers rubberized asphalt - titled Rubber Modified Asphalt - a key measure in the province's strategy for dealing with scrap tires.

- As noted in AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), AMO has urged the Ontario government to use rubberized asphalt if it is subjected to, and meets, environmental and performance standards.

  AMO stresses the importance of doing this since it still has many concerns with this option because of the inability to recycle rubberized asphalt, the higher cost for this method as opposed to other asphalt, and the concern about the asphalt's acceptability for Ontario's climate.

  While testing of this method continues, as is noted in the OSTTF's Action Plan, this strategy should not form the basis of the province's short-term tire strategy as it is not yet proven as a solution.

- AMO also notes that under Action 1, assessing the performance of this asphalt, the OSTTF has said municipal projects can be "financially assisted" by the MOE. As noted above, AMO has financial and disentanglement concerns about this

approach. AMO is also concerned about the financial implications of the OSTTF's proposal that the MOE might set "a minimum annual quantity of rubber modified asphalt pavement to be laid in these projects". (page 7)

6 Support Systems - Stockpiling

- In AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), AMO strongly urged the Ontario government not to pursue the philosophy, even in the short-term, of stockpiling scrap tires.

- The OSTTF's Action Plan relies heavily on the stockpiling of tires. As noted in the section on Licensed Scrap Tire Receiving Facilities, the provincial government plans to have 10 to 15 regional sites - called receiving facilities - developed in strategic locations throughout the province. These sites are expected to stockpile approximately 10 to 15 million tires over the next five years.

  The OSTTF Action Plan envisions that storage capacity will be required for 13 million tires before markets for value-added products begin to decrease the stockpiles. It notes, however, that when there are 15 million tires in storage, steps should be taken to ensure that the stockpile does not increase. However, the OSTTF notes this will only be done if it is apparent that the province's goals are not being met. Otherwise, the tires will continue to be stockpiled.

- AMO is extremely concerned that at this point, stockpiling still forms the backbone of the OSTTF's recommended short-term strategy for scrap tire management in Ontario. As noted in AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), municipalities do not favor this approach because of the environmental hazards which it could pose.

AMO details in its policy position the results of

the Tyre King fire in the Regional Municipality of Haldimand-Norfolk. This fire, which occurred because of arson in a storage site containing about 13 million scrap tires, took seventeen days to extinguish and more than a year to clean up. Considerable environmental damage was done and provincial, municipal and private costs for addressing the situation were extremely high.

The OSTTF's Action Plan notes that municipalities may opt to begin these receiving facilities - and it is recommended that there be 100 per cent funding to encourage municipalities to start these. What the Action Plan does not say is that even if a municipality does not opt to start such a facility, the facilities will be situated in municipalities and there could be great cost implications to municipalities if a facilities in their areas faced the same situation as Haldimand-Norfolk.

The OSTTF or Ministry of the Environment might counter that the MOE has improved its regulations governing site storage of waste tires. While that is true, there is no guarantee that another fire could not start in a receiving facility and municipalities should not be responsible for the potential environmental damage or costs of a measure which has been forced on them by a provincial strategy which they have opposed.

RECOMMENDATION #5:

In the interim, the province should be responsible for all of the costs and consequences of these interim measures of stockpiling tires.

7 Trigger Point - Tire-derived Fuel

- Some comments about this option and the trigger point were raised earlier in this paper.
- AMO is concerned that tire-derived fuel is still being considered only as a last option when the infrastructure for many of the province's other initiatives, such as value-added products, is not yet in place and may not be for several years.
- As noted in AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991), AMO still urges the Ontario government to approve the use of tire-derived fuel.
- AMO also urges the provincial government to test tire-derived fuel now rather than after the testing of rubberized asphalt. This is essential so the tire-derived fuel option is available as soon as possible. Only in this way will this option be ready for use as an interim measure as deemed necessary in this document by the "trigger-point".

8 Conclusion

The Association of Municipalities of Ontario (AMO) appreciates the work which the Ontario Scrap Tire Task Force has done on its Action Plan for the Management of Scrap Tires in Ontario. However, AMO continues to be concerned about the financing, stockpiling and low priority put on tire-derived fuel when so many of the short-term options for dealing with scrap tire waste management are so tentative or far from being developed. Municipalities are on the front line of dealing with this problem and they need support for this area to begin now and not in four years.

In conclusion, AMO again urges the provincial government to institute the recommendations which municipalities have made through AMO and AMO's Policy Position on Scrap Tire Management and the Ontario Tire Tax (91-16, November 1991). These recommendations have been augmented by the additional recommendations contained in this paper and they, too, should become part of the province's policy on scrap tire management.

Appendix A - Acknowledgments

The Association of Municipalities of Ontario would like to thank the members of its Environmental Policy Committee who volunteered their time to produce this document. The members of the team were:

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SUMMARY OF RECOMMENDATIONS

RECOMMENDATION #1:

The provincial government should make elimination of all scrap tire waste in Ontario the goal of its scrap tire management program. Reducing tire to "an acceptable level" should only be an interim goal used on the way to meeting the province's ultimate goal.

RECOMMENDATION #2:

The Ontario government should:

a) immediately implement a strategy for managing scrap tires which does not include stockpiling so this waste;

b) test tire-derived fuel now, rather than after the testing of rubberized asphalt; and

c) introduce tire-derived fuel, at a minimum, as an interim measure until all scrap tires in Ontario can be recycled.

RECOMMENDATION #3:

The Ontario government should be responsible for operating any licensed scrap tire receiving facilities required by its provincial policy. Municipalities should not be required to institute these as this would run counter to the provincial-municipal disentanglement process now occurring.

RECOMMENDATION #4:

The Ontario government should dedicate all of the revenue from the Ontario Tire Tax to solving the scrap tire waste management problem. This is important so the province does not just take the money and leave municipalities with the problem.

RECOMMENDATION #5:

In the interim, the province should be responsible for all of the costs and consequences of these interim measures of stockpiling tires.

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